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January 15, 2015

VIA ECF TO:

The Honorable Brian M. Cogan
United States District Court, Eastern District of New York
225 Cadman Plaza South, 704S
Brooklyn, NY 11201

Re: Huebner v. Midland Credit Management, Case No. 14-cv-06046-BMC

Dear Judge Cogan:

As Your Honor knows I represent the Plaintiff in this action.

By Order dated February 11, 2015 Your Honor directed that on or before February 18, 2015 my client and I show cause why this Court should not award fees and costs or issue sanctions pursuant to Rule 11.

Due to the broad reach of Your Honor's Memorandum and Opinion, I immediately directed that my client collect his records regarding this matter, additionally, on February 12, 2015 a transcript of the February 2, 2015 telephone conference was ordered from the ESR department.

However, to date I have not received a response from the ESR department. Moreover, my client informed me that he needs more time to retrieve his records regarding the Verizon account and communications as far back as 2011 with not less than one other collection agency which noted his dispute, duly ceased collection regarding the Verizon account, and informed him that the Verizon account was being disposed of.



Allan & Edwina Johnson

January 18, 2011

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Without the transcript of the conference, the afore-referenced records regarding my client's Verizon account and his communications with the prior debt collector, it is not possible for my client and I to show cause, pursuant to Your Honor's Order dated February 11, 2015.

Thus, due to the foregoing, my client and I are requesting an extension of two weeks to March 4, 2015 to comply with Your Honor's Order.

Respectfully,

POLTORAK PC

/ s / Elie Poltorak

Elie Poltorak

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